

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

SEP 01 2015

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

HECTOR DE LEON-RAMIREZ

§  
§  
§  
§

Criminal No.

M - 15 - 1184

INDICTMENT

THE GRAND JURY CHARGES:

Count One

On or about June 27, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**HECTOR DE LEON-RAMIREZ**

knowing and in reckless disregard of the fact that an individual, who was an alien, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree with other persons known and unknown to the Grand Jurors to transport and move said alien within the United States in furtherance of such violation of law, that is, from a location near Brownsville, Texas, to another location near Mission, Texas, by means of a motor vehicle.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

Count Two

On or about June 27, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**HECTOR DE LEON-RAMIREZ**

knowing and in reckless disregard of the fact that Ingrid Lorena Grijalva-De Leon was an alien

who had come to, entered, and remained in the United States in violation of law, did knowingly transport, move, attempt to transport, and attempt to move said alien within the United States in furtherance of such violation of law, that is, from a location near Brownsville, Texas, to another location near Mission, Texas, by means of a motor vehicle, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

**Count Three**

On or about August 4, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**HECTOR DE LEON-RAMIREZ**

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree with other persons known and unknown to the Grand Jurors to conceal, harbor, and shield from detection said aliens in any place, including any building or any means of transportation, to wit: in a building near Mission, Texas.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

**Count Four**

On or about August 4, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**HECTOR DE LEON-RAMIREZ**

knowing and in reckless disregard of the fact that Norly Renan Zambrano-Nunez was an alien who

had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a building near Mission, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

**Count Five**

On or about August 4, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**HECTOR DE LEON-RAMIREZ**

knowing and in reckless disregard of the fact that Josue David Rios-Martinez was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a building near Mission, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

A TRUE BILL

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FOREPERSON

KENNETH MAGIDSON  
UNITED STATES ATTORNEY

  
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ASSISTANT UNITED STATES ATTORNEY